

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
v.) CRIMINAL NO. 11-cr-10286-DPW
CATHERINE GREIG,)
Defendant.)

)

**UNITED STATES' STATUS REPORT
CONCERNING LOCAL RULE 116.5(A)**

The United States files this status report in connection with the initial status conference of the above-captioned matter scheduled for September 29, 2011:

1. At this time, the United States does not seek relief from the otherwise applicable timing requirements imposed by L.R. 116.3.
2. The United States is not aware of any request by the defendant for discovery concerning expert witnesses under Fed. Crim. P. 16(a)(1)(E). The United States has no present intention of calling any expert witnesses in its case in chief. The United States will promptly inform the defendant if its intentions change in this regard.
3. The United States does not anticipate providing additional information related to a witness' criminal record. The United States does anticipate providing additional discovery in connection with the current indictment as a result of the receipt of information, documents, reports of examinations or tests. To the extent witnesses provide or the United States obtains additional documents during the course of trial preparation, any additional relevant documents provided to counsel for the United States will be shared with opposing counsel promptly. In addition, the United States anticipates seeking a superseding indictment in the future. At that time, the United States may produce additional discovery.
4. The United States does not request a motion date to be set under Fed. R. Crim. P. 12(c), and is unaware of whether the defendant seeks such a date.

5. For purposes of the Speedy Trial Act, this court has already excluded the time from August 11, 2011 to the date of the initial status conference set for September 29, 2011. See Dkt. 30.
6. It is too early to determine whether plea negotiations will resolve this case. Should this matter proceed to trial, the government anticipates that it would need 15 trial days to present its case in chief.
7. Should defendant believe an interim status conference is appropriate, with a final status conference to be scheduled later, the United States will assent to the defendant's request, so long as the time period between conferences is excluded under the Speedy Trial Act.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Jack W. Pirozzolo
JACK W. PIROZZOLO
First Assistant U.S. Attorney
JAMES D. HERBERT
Assistant U.S. Attorney
John Joseph Moakley United States Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3189

CERTIFICATE OF SERVICE

I, Jack W. Pirozzolo, hereby certify that on September 28, 2011, I served a copy of the foregoing document via electronic filing on counsel for the defendant.

/s/ Jack W. Pirozzolo
Jack W. Pirozzolo